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**FILED**

6 JAN 22 2016

7 CLERK, U.S. DISTRICT COURT  
8 SOUTHERN DISTRICT OF CALIFORNIA  
9 BY DEPUTY

10 UNITED STATES OF AMERICA,

11 Plaintiff,

12 v.

13 BALTAZAR FITCH,

14 Defendant.

15 Case No. 16 cr 123-BAS

16 INFORMATION

17 Title 18, U.S.C., Sec. 5322 – Willful  
18 Violation of the Bank Secrecy Act  
19 through Failure to Maintain an Effective  
20 Anti-Money Laundering Program under  
21 Title 31, United States Code, Section  
22 5318(h) and 5322; Title 18, United States  
23 Code, Section 2

24 The United States Attorney charges:

25 Between no later than 2012 and continuing through 2013, within the Southern  
26 District of California and elsewhere, defendant BALTAZAR FITCH willfully violated  
27 Title 31, United States Code, Section 5318(h) and the regulations prescribed thereunder,  
28 specifically, Title 31, Code of Federal Regulations, Section 1022.210, related to various  
money transmitting businesses, which were all operating under Defendant's direction,  
control, and ownership as domestic financial institutions and money transmitting  
businesses, by failing to develop, implement, and maintain an effective anti-money  
laundering program all in violation of Title 31, United States Code, Sections 5318(h) and  
5322, and Title 18, United States Code, Section 2.

29 DATED: 1/22/16

LAURA E. DUFFY  
United States Attorney

30 s/ Daniel C. Silva

31 Daniel C. Silva  
32 Assistant U.S. Attorney